

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel. ALEX DOE, RELATOR, et al.*

*Plaintiffs,*

v.

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC., *et al.*

*Defendants.*

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Civil Action No. 2-21-CV-022-Z

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**TEXAS'S MOTION FOR SUMMARY JUDGMENT**

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The State of Texas moves for summary judgment under Rule 56 of the Federal Rules of Civil Procedure. As set forth in the brief filed in support of Plaintiffs' motions for summary judgment, and in Relator's Motion for Partial Summary Judgment, Plaintiffs have shown there is no genuine dispute as to any material fact and Plaintiffs are entitled to judgment as a matter of law. Texas respectfully moves this Court for summary judgment under the Texas Medicaid Fraud Act. Tex. Hum. Res. Code § 36.002(12).

Dated: January 6, 2023

Respectfully submitted,

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**COUNSEL FOR STATE OF TEXAS**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2023, this document was electronically filed and served via the Court's CM/ECF system.

/s/ Amy Snow Hilton

**AMY SNOW HILTON**